

Exhibit P

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

ADREA, LLC,

Plaintiff,

v.

13-CV-4137 (JSR)

BARNES & NOBLE, INC.,
BARNESANDNOBLE.COM LLC, and NOOK
MEDIA LLC,

Defendants.

ADREA, LLC’S SUPPLEMENTAL INITIAL DISCLOSURES

Pursuant to Federal Rule of Civil Procedure 26(a)(1), ADREA, LLC (“ADREA” or “Plaintiff”) hereby submits the following supplemental initial disclosures to Barnes & Noble, Inc., barnesandnoble.com LLC, and Nook Media, LLC (collectively, “Defendants”) based on information reasonably available to ADREA at this time. In so doing, ADREA does not intend to waive any objections, such as relevance or admissibility, or any applicable privileges, such as attorney-client or work product immunity. ADREA reserves the right to amend and/or supplement these disclosures as necessary and to rely on the testimony of any person, or documents, it subsequently identifies as relevant to this dispute.

Pursuant to Rule 26(a)(1) and other applicable Federal Rules of Civil Procedure, ADREA is not disclosing documents or information protected by the attorney-client privilege, work product immunity doctrine or any other applicable privilege. ADREA’s disclosures do represent, however, a good faith effort by ADREA to identify information presently available to it that falls

within the scope of Rule 26(a)(1). As such, these disclosures do not include information that may be used solely for impeachment purposes.

ADREA's disclosures are made without, in any way, waiving: the right to object on any and all grounds, at any time, to any discovery request involving or relating to the subject matter of these disclosures, or to the use of any such information, for any purpose, in whole or in part, in any subsequent proceeding in this action or any other action.

The disclosures set forth below are organized to correspond to the general categories set forth in Rule 26(a)(1) and are made subject to the above objections and qualifications.

A. The name and, if known, the address and telephone number of each individual likely to have discoverable information—along with the subject(s) of the information—that the disclosing party may use to support its claims or defenses, unless solely for impeachment.

Based upon information reasonably available to ADREA at this time, ADREA identifies the following individuals likely to have discoverable information that ADREA may use to support its claims and defenses. Identification of an individual is not an affirmative assertion by ADREA that the individual has discoverable information, but rather, that the individual may have discoverable information. Moreover, the actual knowledge of persons identified herein may or may not exceed the scope of the subject matter that has been listed in the entries set forth herein, and is not a representation that the witness necessarily has all information on that subject matter. The individuals denoted by an asterisk (*) may not be contacted, except through the undersigned Plaintiff's counsel.

Name	Subject Matter
<p>John S. Hendricks* One Discovery Place Silver Springs, MD 20910 240.662.2000</p> <p>7110 45th St. Chevy Chase, MD 20815 301.299.4870</p>	U.S. Patent Nos. 7,298,851 B1 and 7,299,501 B2, including inventorship, conception, reduction to practice, diligence, prosecution, and related issues
<p>Michael L. Asmussen* 2627 Meadow Hall Dr. Herndon, VA 20171 703.318.7350</p>	U.S. Patent No. 7,298,851 B1, including inventorship, conception, reduction to practice, diligence, prosecution, and related issues
<p>John S. McCoskey* 5925 Serenity Ln. Derwood, MD 20855 303.663.1096</p>	U.S. Patent No. 7,298,851 B1, including inventorship, conception, reduction to practice, diligence, prosecution, and related issues
<p>Yevgeniy Eugene Shteyn*</p>	U.S. Patent No. 7,620,703 B1, including inventorship, conception, reduction to practice, diligence, prosecution, and related issues
<p>Wilburn L. Chesser Arent Fox LLP 1717 K Street, NW Washington, DC 20036 202.715.8434</p>	Preparation and prosecution of the patent applications for U.S. Patent Nos. 7,298,851 B1 and 7,299,501 B2
<p>Bradley M. Ganz Ganz Law, P.C. 163 SE 2nd Ave. P.O. Box 2200 Hillsboro, Oregon 97123 503.844.9009</p>	Preparation and prosecution of the patent applications for U.S. Patent No. 7,620,703 B1
<p>Robert M. McDermott, Esq. 804.493.0707</p>	Preparation and prosecution of the patent applications for U.S. Patent No. 7,620,703 B1
<p>Brian S. Myers Myers Wolin, LLC 100 Headquarters Plaza North Tower, 6th Floor Morristown, NJ 07960 973.401.7157</p>	Preparation and prosecution of the patent applications for U.S. Patent No. 7,620,703 B1

Name	Subject Matter
Jeffery Jay McDow*	Ownership of, infringement of and licensing and enforcement activities concerning, U.S. Patent Nos. 7,298,851 B1, 7,299,501 B2 and 7,620,703 B1 (“Patents-in-Suit”)
Talal Shamoon*	Ownership of, infringement of and licensing and enforcement activities concerning, the Patents-in-Suit
William Ernest Rainey III*	Ownership of, infringement of and licensing and enforcement activities concerning, the Patents-in-Suit
Shawn Durga Ambwani*	Infringement of and licensing activities concerning the Patents-in-Suit
Deepak Mulchandani Barnes & Noble	Operation, functionality, and marketing of the accused products
Jim Hilt Barnes & Noble	Marketing information related to the accused products
Richard Nagle Barnes & Noble	Sales and financial information related to the accused products
Sudeep Narain Barnes & Noble	Operation and functionality of the accused products
Bharath Kalyan Barnes & Noble	Operation and functionality of the accused products
Susan Lally Barnes & Noble	Operation and functionality of the accused products
Elizabeth Brannen Barnes & Noble	Defendants’ infringement and notice of the Patents-in-Suit
Jeff Snow c/o Cooper & Dunham LLP 30 Rockefeller Plaza 20 th Floor New York, NY 10112 212.278.0400	Defendants’ infringement and notice of the Patents-in-Suit

Name	Subject Matter
Neil Balthaser 932 Governors Bay Dr. Redwood City, CA 94065-2205 510.908.0080	Operation and functionality of the accused products

ADREA will identify any experts who will testify at trial in accordance with the Case Management Plan and the Federal Rules of Civil Procedure. ADREA reserves the right to identify additional persons if it learns during the course of its investigation in this action that such additional persons have knowledge of discoverable information that ADREA may use to support its claims or defenses.

B. A copy of, or a description by category and location of, all documents, electronically stored information, and tangible things that are in the possession, custody, or control of the party and that the disclosing party may use to support its claims or defenses, unless solely for impeachment.

Based on information reasonably available to ADREA at this time, ADREA describes below the documents, data compilations and tangible things that are in the possession, custody, and control of ADREA or its counsel that it may use to support its claims or defenses.

1. The Patents-in-Suit;
2. Prosecution history of the Patents-in-Suit;
3. Documents relating to ownership of the Patents-in-Suit;
4. Documents concerning Defendants' knowledge of the Patents-in-Suit;
5. Documents concerning Defendants' infringement of the Patents-in-Suit;
6. Defendants' patents and patent applications; and
7. Documents concerning damages associated with Defendants' infringement of the Patents-in-Suit, including but not limited to licensing-related documents.

By providing the foregoing description of documents, ADREA does not waive its right to withhold production of any document in its possession that is protected by the attorney-client privilege, the work product immunity, or any other claim of privilege or immunity, or that ADREA is prohibited from producing under a confidentiality agreement, or where production of a such a document would be otherwise unlawful. ADREA expressly reserves the right to identify and use other documents in support of its claims or defenses if, during the course of litigation, such documents become known to ADREA.

C. A computation of each category of damages claimed by the disclosing party—who must also make available for inspection and copying as under Rule 34 the documents or other evidentiary material, unless privileged or protected from disclosure, on which each computation is based, including materials bearing on the nature and extent of injuries suffered.

ADREA seeks damages in the form of monetary compensation for Defendants' past and continuing infringement of the Patents-in-Suit. ADREA expects to seek compensation for any proven infringement in accordance with 35 U.S.C. § 284, which shall be no less than a reasonable royalty. ADREA also claims entitlement to pre-judgment and post-judgment interest, treble damages for willful infringement, as well as costs and attorneys' fees pursuant to 35 U.S.C. § 285, as well as any other monetary remedies authorized by the law. The amount of damages will be the subject of expert testimony at trial. ADREA will make its expert disclosures in accordance with the Case Management Plan and Federal Rules of Civil Procedure.

D. Any insurance agreement under which an insurer may be liable to satisfy all or part of a possible judgment in the action or to indemnify or reimburse for payments made to satisfy the judgment.

ADREA is unaware at this time of any insurance agreement under which an insurer may be liable to satisfy all or part of a possible judgment in this action or to indemnify or reimburse for payments made to satisfy the judgment.

Dated: November 20, 2013

Respectfully submitted,

PROSKAUER ROSE LLP

/s/ Patrick J. Niedermeier

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CERTIFICATE OF SERVICE

I, Patrick J. Niedermeier, the undersigned attorney, hereby certify that on November 20, 2013, copies of the foregoing document were served by electronic mail upon:

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